

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

CARMEN LIDIA JORGE, et. al.,

Plaintiffs

v.

POLICE DEPARTMENT OF THE COMMONWEALTH
OF PUERTO RICO et. al.,

EMMANUEL FERNANEZ JORGE et. al.,

Plaintiffs

v.

SERGEANT GALARZA-SOTO, & ORTIZ CRUZ

CIVIL NO. 11-2268 (JAG)

Consolidated with

CIVIL NO. 14-1590(GAG)

**MOTION SUBMITTING CERTIFIED ENGLISH TRANSLATIONS OF
DOCUMENTS IN SPANISH LANGUAGE**

TO THE HONORABLE JAY A. GARCÍA-GREGORY, J:

COME NOW co-defendants José Figueroa-Sancha, Leovigildo Vázquez, Iván Lebrón-Lebrón, Julio E. Galarza Soto, and Juan Carlos Ortiz-Cruz (hereinafter the “defendants”), all in their personal capacities only, through the undersigned attorney, without waving any right or defense arising from Title III of Puerto Rico Oversight, Management and Economic Stability Act” (“PROMESA”), 48 U.S.C. §§ 2101 *et seq.*, and the Commonwealth’s Petition under said Title or under this case, and very respectfully **SET FORTH** and **PRAY** as follows:

1. On March 6th, 2020 the appearing defendants filed their Motion For Reconsideration of the Court’s Order at ECF NO. 315. (See Docket No. 321)

2. In support of the aforesaid motion, the Defendants filed *Exhibit No. 1*, which referred to the Puerto Rico Supreme Court’s case of *Fraguada Bonilla v. Hosp. Aux. Mutuo*, 186 D.P.R. 365 (2012), filed in its original Spanish Language.

3. An extension of time was requested to submit the certified English translations of the above-mentioned exhibit (See Docket No. 320)

4. Attached hereto, the appearing Defendants submit the certified English translations of the Spanish language documents in Exhibit No. 1.

WHEREFORE the appearing Defendants very respectfully request the Court to accept the exhibits submitted forthwith as certified English translations of the ones previously filed in the Spanish language with Motion For Reconsideration the Court's Order at ECF NO. 315.

IT IS HEREBY CERTIFIED that on this same date the instant document has been filed with the Court's CM/ECF System, which will simultaneously serve notice on all counsels of record to their respective registered e-mail addresses.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this March 10th, 2020

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